

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,)	
)	
Plaintiff,)	Civil Action No. 06-726 (JJF)
)	Civil Action No. 07-357 (JJF)
v.)	
)	CONSOLIDATED CASES
CHI MEI OPTOELECTRONICS)	
CORPORATION, et al.,)	
)	
Defendants.)	
)	
)	

**DEFENDANT CHI MEI OPTOELECTRONICS CORPORATION'S
SUR-REPLY IN OPPOSITION TO PLAINTIFF'S MOTION FOR
ENTRY OF PROTECTIVE ORDER**

As CMO stated in its Opposition Brief (D.I. 292), CMO has offered to consider any reasonable protective measures, in addition the several already in the proposed protective order, to address LG Display's concerns about the security of highly confidential material. On July 7, 2008, the Court approved a set of such measures in resolution of AUO and LG Display's dispute regarding the treatment highly confidential product files. In order to allay the security concerns LG Display described in its Reply Brief, CMO would accept a similar set of protective measures to apply to the three-person in-house litigation team (the "designated personnel") that are the subject of the dispute between CMO and LG Display. These measures would include:

- Native format product files such as mask files will be kept on a non-networked computer in a room at the offices of CMO's outside counsel, to which access will be restricted to outside counsel and the designated personnel, and the designated personnel will access

these files only on this non-networked computer and will take no print-outs away from this room.

- The designated personnel will have access to other highly confidential information only in the same restricted-access room at the offices of CMO's outside counsel.
- In addition to the agreed-upon one year prosecution ban on work on patents involving the subject matter of any of the patents in suit, the designated personnel will not participate in any way with patent prosecutions during the course of this action.

These measures, in combination with the significant security measures already in place in both parties' proposed protective orders, should provide a secure context for the delimited in-house access CMO has requested.

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Dated: July 9, 2008
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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on July 9, 2008, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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CHI MEI OPTOELECTRONICS)	[PROPOSED] ORDER
CORPORATION, et al.,)	
)	
Defendants.)	
)	
)	

AND NOW, the Court, this _____ day of _____, 2008 upon consideration of Plaintiff LG Display Co., Ltd.'s Motion for Entry of Protective Order and Defendant Chi Mei Optoelectronics Corporation's Opposition thereto, does hereby **ORDER**:

The parties shall craft a protective order that permits access to materials designated "highly confidential" for three members each of the legal departments of Chi Mei Optoelectronics and LG Display Co., Ltd. (the "designated personnel"), provided that such personnel shall agree to be bound by the terms of the protective order and to be subject to the authority of the Court in this matter and:

- Native format product files such as mask files will be kept on a non-networked computer in a room at the offices of the parties' respective outside counsel, to which access is limited to outside counsel and the designated personnel, and the designated personnel will access these files only on this computer, and will take no print-outs away from this conference room.
- The designated personnel will have access to other materials designated highly confidential only in this same restricted-access room at the offices of the parties' respective outside counsel.

- Designated personnel will not participate in any way with patent prosecutions during the course of this action.

IT IS SO ORDERED:

The Honorable Joseph J. Farnan, Jr.